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**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH**

IN RE: § **CASE NO. 21-25390**
Kyleigh Spratley § **Chapter 13**
Debtor § **Honorable Kevin R. Anderson**

MOTION TO INCUR NEW DEBT AND APPLICATION FOR COMPENSATION

Comes now Kyleigh Spratley (hereinafter "Debtor"), through counsel, and hereby files this Motion to Incur New Debt. Debtor respectfully seeks this Court's approval for the purchase of a new vehicle and in support thereof, Debtor represents the following facts:

1. This Court has jurisdiction over this matter pursuant to 11 U.S.C. §105 and 28 U.S.C. §1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. §157(b).
2. On or about December 23, 2021, Debtor filed a Voluntary Petition for relief under Chapter 13 of the United States Bankruptcy Code pursuant to the provisions of 11 U.S.C. Section 362.
3. Debtor is current on the Chapter 13 Plan payments.
4. Debtor is in month one (1) of the Chapter 13 Plan.
5. Debtor's Plan calls for a payment of \$250.00.

6. Debtor currently has no automobile and no other reliable source of transportation.
7. Debtor is in need of a reliable vehicle to get to and from work, perform day-to-day tasks to be able to complete a successful Chapter 13 case.
8. If the motion to incur new debt is denied it will make it difficult for Debtor to maintain employment and continue funding the Chapter 13 Plan.
9. Debtor wishes to purchase a 2015 Hyundai Santa Fe or similar vehicle, with a financed price of up to \$20,827.29 at approximately 20.49% interest and seventy-two (72) monthly payments of up to approximately \$504.81, pursuant to the terms in Exhibit A.
10. Counsel is seeking fees of approximately \$1,000.00 associated with bringing this Motion and will file a separate fee application. Counsel will provide a copy of the fee application to any interested party upon request.

WHEREFORE, Debtor prays that the Court enter an Order allowing Debtor to incur this additional debt for the limited purpose as stated above; and for such other and further relief as the Court deems just.

Dated this: January 14, 2022

/s/ Cory B. Cottam
Cory B. Cottam
Attorney for Debtor

Exhibit

A

(UT) New Start Auto, LLC

4050 S. Main St

Salt Lake City

(801)266-3266 Phone

(801)906-2168 Fax

UT 84107

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Customer Payment Quote

QUOTE PREPARED FOR KYLEIGH SPRATLEY	QUOTE DATE / DEAL ID 01/07/2022 9431195
ADDRESS 163 N 600 E	TELEPHONE (385)298-3544
CITY, STATE ZIP Kaysville UT 84037	SALESPERSON(S)

VEHICLE BEING QUOTED

STOCK #:	247360
VIN:	5XYZT3LB2FG247360
YEAR:	2015
MAKE:	Hyundai
MODEL:	Santa Fe
MILEAGE:	64709
EXTERIOR COLOR:	
EXTERIOR TRIM/BODY:	Sport 2.4 FW SPORT UTILI
INTERIOR COLOR:	
ADDITIONAL INFO:	6-Speed Automat 2.4L L4 DOH
OPTIONS:	ABS Brakes,Air Conditioning,Alloy Wheels,AM/FM Radio,Child Safety Door Locks,Cruise Control,Daytime Running Lights,Deep Tinted Glass,Driver Airbag,Electronic Brake Assistance,First Aid Kit,Front Side Airbag,Interval Wipers,Passenger

TRADE IN DESCRIPTION

YEAR:	
MAKE:	
MODEL:	
MILEAGE:	
VIN:	
TRADE IN AMOUNT:	0
TRADE IN PAYOFF:	0
BALANCE OWED TO:	

FINANCING INFORMATION

VEHICLE PRICE:	\$19,000.00
CASH DOWN:	\$0.00
DEFERRED DOWN(S):	\$0.00
NET TRADE-IN:	\$0.00
ADD-ON PRODUCTS: (Warranty, Credit Life,etc)	\$0.00
ITEMIZED CHARGES: (Dealer Inv. Tax, Title, License, Doc Fees)	\$438.91
SALES TAX:	\$1,388.38
AMOUNT FINANCED:	\$20,827.29
LIEN HOLDER:	Kaizen Financial, LLC PO Box 651126 Salt Lake City UT 84165

PAYMENT INFORMATION

APR:	20.4904%
CONTRACT DATE:	01/07/2022
72	\$504.81 02/07/2022 Monthly
0	\$0.00 01/07/2028

DEFERRED DOWNS

\$0.00	\$0.00
\$0.00	\$0.00
\$0.00	\$0.00

THE DESCRIBED VEHICLE IS SOLD AS IS, WITHOUT EITHER EXPRESSED OR IMPLIED WARRANTIES OF ANY KIND BY SELLER, INCLUDING WARRANTIES OF MERCHANTABILITY OR FITNESS, AND BUYER WILL BEAR THE ENTIRE EXPENSE OF REPAIRING OR CORRECTING ANY DEFECTS THAT PRESENTLY EXIST OR THAT MAY OCCUR IN THE VEHICLE.

I/WE HAVE READ, UNDERSTAND AND AGREE TO THE TERMS AND CONDITIONS SET FORTH IN THIS PAYMENT QUOTE.

Seller _____
(UT) New Start Auto, LLC

Buyer _____
KYLEIGH SPRATLEY

Officer _____

Co-Buyer _____